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Attorneys for Defendants State Farm Mutual  
Automobile Insurance Company (erroneously  
sued as State Farm Mutual, Inc.), State Farm  
General Insurance Company (erroneously sued  
as State Farm General Incorporated), and State  
Farm Life Insurance Company

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

CARMEL STEVENS and LADALE  
JACKSON, individually and on behalf  
of all similarly situated,

Plaintiffs,

v.

STATE FARM MUTUAL, INC.;  
STATE FARM GENERAL  
INCORPORATED; STATE FARM  
LIFE INSURANCE COMPANY and  
DOES 1 through 50, inclusive,

Defendants.

CASE NO. 2:22-cv-06362 FLA (MAAx)

**DEFENDANTS STATE FARM  
MUTUAL AUTOMOBILE  
INSURANCE COMPANY, STATE  
FARM GENERAL INSURANCE  
COMPANY, AND STATE FARM  
LIFE INSURANCE COMPANY'S  
REQUEST FOR JUDICIAL NOTICE  
IN SUPPORT OF RESPONSE TO  
COURT'S JULY 28, 2023 ORDER  
TO SHOW CAUSE**

Action Filed: July 6, 2022  
FAC Filed: December 5, 2022  
Trial Date: None set

1           **TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR**  
 2           **ATTORNEYS OF RECORD:**

3           **PLEASE TAKE NOTICE THAT**, in accordance with Rule 201 of the Federal  
 4 Rules of Evidence, Defendants State Farm Mutual Automobile Insurance Company,  
 5 State Farm General Insurance Company, and State Farm Life Insurance Company  
 6 (together, “Defendants”) by and through their attorneys of record, respectfully request  
 7 that this Court take judicial notice of Exhibits filed in support of Defendants’ Response  
 8 to Order to Show Cause attached hereto as:

9           1.     **Exhibit 1**, which is a true and correct copy of the court’s tentative and final  
 10 ruling on Plaintiff’s counsel’s fee request in *Mykyn Woods v. Greystar Management*  
 11 *Services, LP*, BC670867 (Cal. Sup. Ct.); and

12          2.     **Exhibit 2**, which is a true and correct copy of the court’s order awarding  
 13 attorneys’ fees in *Mitchell v. Soleyman*, Case No. 00-12951-AHMCTX (C.D. Cal. Aug.  
 14 12, 2002),

15          which are authenticated in the Declaration of Bradley J. Hamburger filed  
 16 concurrently herewith.

17          Rule 201(b) permits this Court to take judicial notice of any fact “not subject to  
 18 reasonable dispute” because it can be accurately and readily determined from sources  
 19 whose accuracy cannot reasonably be questioned. Fed. R. Evid. 201(b). *Intri-Plex*  
 20 *Techs., Inc. v. Crest Grp., Inc.*, 499 F.3d 1048, 1052 (9th Cir. 2007). A court “must take  
 21 judicial notice if a party requests it and the court is supplied with the necessary  
 22 information.” *Id.* at 201(c)(2).

23          Defendants request this Court to take judicial notice of Exhibits 1 and 2 to the  
 24 Declaration of Bradley J. Hamburger, because they are court orders related to attorney  
 25 fee awards, for purposes of determining the amount in controversy for removal of this  
 26 matter. In particular, Exhibit 1 is the court’s ruling on Plaintiff’s motion for attorneys’  
 27 fees approving the use of a \$750-per-hour rate for Plaintiffs’ lead counsel, Jamon Hicks.

1 Exhibit 2 is s court order awarding \$187,734 in attorneys' fees for an Unruh Act claim  
2 involving race discrimination.

3 As all of the foregoing exhibits are public court records or filings that are "not  
4 subject to reasonable dispute" and related to the issues in this case, they all are properly  
5 subject to judicial notice. *See* Fed. R. Evid. 201(b)(2). The Ninth Circuit has made clear  
6 that it is proper to take judicial notice of "court filings and other matters of public  
7 record." *Reyn's Pasta Bella, LLC v. Visa USA, Inc.*, 442 F.3d 741, 746 n.6 (9th Cir.  
8 2006); *Rosales-Martinez v. Palmer*, 753 F.3d 890, 894 (9th Cir. 2014) ("It is well  
9 established that we may take judicial notice of judicial proceedings in other courts.").  
10 And courts have recognized that "[f]ees awards are matters of public record" *Velez v.*  
11 *Wynne*, 220 F. App'x 512, 518 (9th Cir. 2007).

12 Accordingly, Defendants respectfully request that this Court take judicial notice  
13 of the exhibits identified above and attached hereto and authenticated by the  
14 concurrently filed Declaration of Bradley J. Hamburger.

15  
16 DATED: August 11, 2023

GIBSON, DUNN & CRUTCHER LLP

17  
18 By: /s/ Bradley J. Hamburger  
Bradley J. Hamburger

19 Attorneys for Defendants State Farm  
20 Mutual Automobile Insurance Company  
(erroneously sued as State Farm Mutual,  
21 Inc.), State Farm General Insurance  
Company (erroneously sued as State Farm  
22 General Incorporated), and State Farm  
Life Insurance Company  
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